

*Nice memo, Tony.
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January 31, 1989

Washington Department of Ecology
Northwest Regional Office
4350 - 150th Avenue, N.E.
Redmond, WA 98052-5301

Attention: Mike Rundlett

Dear Mr. Rundlett:

Seattle City Light (SCL) submits these comments concerning Owner/Operator Site Information Forms (Forms) received by the Utility from the Department of Ecology (DOE). We have received four such Forms, relating to Sites that SCL currently manages. DOE staff have been most helpful to my staff in further explaining the procedures, schedule, and origin of information utilized to develop these Forms. Please extend my thanks to Annette Petrie, Dan Cargill, and Bob Goodman for their time and assistance.

Before commenting on the individual sites, I am expressing our comments on the general process leading to the formulation of a final contaminated site list. SCL has the following concerns:

- o At this time, it is unclear whether some of the information contained in these Forms are inaccurate, or whether DOE has obtained information from other sources which SCL is currently unaware of concerning site status or contamination. Although DOE staff have been responsive and helpful in attempting to answer our questions, my staff have been unable to complete file searches at SCL or DOE to verify questionable data. Therefore, we request the opportunity to submit additional comments and information, after we have completed our own records investigation.
- o While we realize the importance and high degree of interest in the number and status of contaminated sites in this State, SCL also believes that the list must represent the best efforts of DOE to compile accurate and meaningful information. We do not believe that a final list published in mid-February by DOE will accomplish those objectives,

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based on our review of sites brought to our attention. A premature and incomplete list will only be misleading to the public and the parties which must respond to the list and individual sites included in the list. Therefore, we urge DOE to strongly consider a later date for publication of its final list, in order to allow both the agency and respondents to responsibly and thoroughly review and compile meaningful information.

- o Our discussions with DOE staff resulted in the identification of site managers or other contact persons who could provide more detailed information on the individual sites in question. SCL recommends that the names of individuals responsible for these sites be included in future Forms, as well as the final list. We also believe that a description and listing of other sources of information (how to review files, where Preliminary Assessments can be reviewed) would also enable compilation of more accurate information.

SCL provides these comments concerning the factual information presented on the following Owner/Operator site Information Forms:

STRANDLEY/MANNING SITE (N-18-0006-000)

SCL has managed Site investigation and cleanup efforts on behalf of nine voluntary parties, pursuant to an Administrative Order on Consent agreed to with the U.S. Environmental Protection Agency. However, the property is owned by parties who are not presently members of this voluntary group. It is not clear whether the Site owners have received this form. They would be able to comment on Site activities, ownership, and SIC codes in Section VI.

As stated in Section VII, land application was not a component of the past transformer scrapping activities on this Site. Waste oils were stored in an above-ground railcar bank which was removed and decontaminated during Site stabilization activities. Groundwater was investigated during Site investigation activities, and continues to be monitored quarterly. No evidence of groundwater contamination has been generated. The physical and chemical nature of PCBs make groundwater contamination highly unlikely.

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NEWHALEM DUMP (N-37-0031-000)

Newhalem Dump was investigated by the U.S. Environmental Protection Agency, Region X, in 1987. The nature of the investigation, including a Site inspection, and findings were issued in a report (Ecology and Environment, June, 1987); this information also exists in the DOE files for this Site. This report concludes that "...the dump does not pose a threat to public health or the environment. Therefore, E&E recommends that no further action under Superfund be conducted of the Site." (Emphasis added). Therefore, the information in Sections II (Site Status), VII (Waste Description - General Waste Categories and Contaminated Environments) should be revised to reflect this conclusion (the update date December 19, 1988 - does not appear to be accurate, since the EPA report is not considered in the Form). The Preliminary Assessment prepared for this Site by DOE also states that "...no evidence exists that hazardous materials were disposed at this property. No further action necessary..."

Section III, Location Description, is inaccurate. Newhalem Dump is located approximately one mile west of Newhalem, not four miles northeast of Newhalem.

SCL strongly recommends the deletion of this Site and elimination of the Form for this site, based on EPA findings in 1987.

SEATTLE CITY LIGHT STORAGE (N-17-0150-000)

Section I, Site identification: this Site is also known as the South Service Center, 3613 - 4th Avenue South, Seattle, WA 98134.

Section VII, Waste Description: no evidence exists, nor is there reason to believe that an air contamination occurs. The Form should be revised to reflect this.

EPA Conducted a Site inspection of this facility in 1987; this inspection included staff from DOE. A report for this facility was completed in January 1988. The Form fails to include this information despite its December 19, 1988 date.

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BOEING CO-NORTH FIELD (N-17-0021-003)

SCL does not own or operate any property with this name. The nearest known facility is the Georgetown Steam Plant (address: Ellis Avenue S. and S. Warsaw, Seattle, WA 98108). This is a former steam driven generation plant which was decommissioned in 1978. The information in Sections I, III, and VI should be revised to reflect this.

It is believed that substantial portions of the property in question, as described above, are owned and operated by two parties: Boeing Commercial Airplane Company and King County. Ownership information in Section VI should be revised to reflect this, and the owners should be notified of the Forms existence.

Waste description categories in Section VII are inaccurate, as they relate to the Georgetown Steam Plant. SCL has no knowledge of the existence of the contaminants listed (except for PCBs) nor do we have any reason to believe that any contamination exists. If operations occurring adjacent to our facility has resulted in environmental contamination, and DOE has evidence of this, please notify us at your earliest convenience. We are concerned with the mobility of the contaminants listed, and the possibility of migration onto our property.

In 1985, a removal of PCB-contaminated soils was conducted at the Georgetown Steam Plant, under agreement and approval of DOE. In January, 1986, a report, with post-cleanup sampling and analytical results, was forwarded to DOE (Gary Brugger).

In summary, SCL believes that the Georgetown Steam Plant should not be included in the final listing, and that our facility be removed from the Form. If DOE continues to believe that a Form is necessary, then a separate Form and listing should be created for the Georgetown Steam Plant. Information should be updated from the DOE Preliminary Assessment (March, 1985) performed on this Site.

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Thank you for the opportunity to comment on the Owner/Operator Site Information Forms. I believe our information will be useful to you, and we request the opportunity to provide further comments. Please contact Terry Kakida, Senior Environmental Analyst, (206 684-3956) with questions or comments. He will be contacting DOE shortly to further research the Agency's files on the above-named Sites.

Sincerely,

Lynn Davision, Director
Environmental Affairs Division

cc: Carol Fleskes, Department of Ecology
Bob Goodman, Department of Ecology
Annette Petrie, Department of Ecology
Dan Cargill, Department of Ecology
Ching-Pi Wang, Department of Ecology

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